

**Community Planning & Development**1775 – 12<sup>th</sup> Ave NW | P.O. Box 1307

Issaquah, WA 98027

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issaquahwa.gov

## Critical Area Neighborhood Meeting Handout

**NEIGHBORHOOD MEETING:**

The City has received a request for a development or construction project that contains a critical area and/or its associated buffer, or areas, within its project boundaries and is holding a Neighborhood Meeting to discuss whether this project might impact the critical area. At the meeting, representatives from the City will describe the project and discuss any potential impacts with any interested members of the community. Criteria for a Neighborhood Meeting:

1. Level 2 or Higher Land Use Permit: Master Site Plan (Level 5 Review), Site Development Permit (Level 3 Review), Administrative Adjustments of Standards (Level 2 Review).
2. Critical Areas Studies Required: Yes, see below.

**APPLICATION INFORMATION:**

<u>Project Name:</u>	Issaquah School District High School #4 and Elementary School #17
<u>Permit Number(s):</u>	PRJ2019-00008, NM21-00002, MSP20-00001, SDP20-00001, AAS20-00012, AAS21-00001, AAS21-00002
<u>Address:</u>	4221 228th Avenue SE
<u>Neighborhood:</u>	Providence Point ( <a href="https://www.issaquahwa.gov/3002/Providence-Point">https://www.issaquahwa.gov/3002/Providence-Point</a> )
<u>Parcel Number(s):</u>	1624069001, 1624069029, 1624069031
<u>Project Description:</u>	Construction of a new consolidated high school and elementary school campus serving approximately 2,000 students and including sports, stadium, sports fields, tennis courts, outdoor learning spaces, structured and surface parking, utility upgrades, new pedestrian and vehicular circulation facilities, site retaining walls, and related improvements. Regulated critical areas present on the site include two Category IV wetlands. Work includes filling Wetland C and providing off-site mitigation. Wetland B will be protected and enhanced.

**SPECIFIC CRITICAL AREA INFORMATION:**

**Critical Area(s)** on-site and/or off-site whose buffers overlap onto the project site:

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> Critical Aquifer Recharge Area         | <input checked="" type="checkbox"/> Geotechnical including:        |
| <input type="checkbox"/> Flood Hazard ( <i>IMC 18.10.530 &amp; 16.36</i> ) | <input type="checkbox"/> Steep Slopes ( <i>IMC 18.10.580</i> )     |
| <input type="checkbox"/> Steams ( <i>IMC 18.10.770-795</i> )               | <input type="checkbox"/> Mine and Erosion ( <i>IMC 18.10.520</i> ) |
| <input checked="" type="checkbox"/> Wetlands ( <i>IMC 18.10.590-760</i> )  | <input type="checkbox"/> Landslide ( <i>IMC 18.10.560</i> )        |
| <input type="checkbox"/> Shorelines ( <i>IMC 18.10.940 and see below</i> ) | <input type="checkbox"/> Seismic ( <i>IMC 18.10.570</i> )          |

**PROJECT CONTACT INFORMATION:**

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<u>Staff Contact:</u>	Cristina Haworth, Planning Consultant <a href="mailto:cristinah@issaquahwa.gov">cristinah@issaquahwa.gov</a>
<u>Property Owner:</u>	Issaquah School District #411
<u>Authorized Agent:</u>	Todd Sawin, PE, of AHBL 2215 N 30th Street Tacoma, WA 98403 <a href="mailto:tsawin@ahbl.com">tsawin@ahbl.com</a>

**LINKS TO PROJECT DOCUMENTS:**

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Project Narrative: [https://products.issaquahwa.gov/ActiveProjects/NM21-00002/NM21-00002\\_1R\\_Project-Narrative.pdf](https://products.issaquahwa.gov/ActiveProjects/NM21-00002/NM21-00002_1R_Project-Narrative.pdf)

Plan Set: [https://products.issaquahwa.gov/ActiveProjects/NM21-00002/NM21-00002\\_1R\\_Plan-Set.pdf](https://products.issaquahwa.gov/ActiveProjects/NM21-00002/NM21-00002_1R_Plan-Set.pdf)

Landscape Plan: [https://products.issaquahwa.gov/ActiveProjects/NM21-00002/NM21-00002\\_1R\\_Landscape-Plan.pdf](https://products.issaquahwa.gov/ActiveProjects/NM21-00002/NM21-00002_1R_Landscape-Plan.pdf)

Critical Area Study & Wetland Mitigation Plan (February 2021):  
[https://products.issaquahwa.gov/ActiveProjects/NM21-00002/NM21-00002\\_1R\\_Wetland-Report.pdf](https://products.issaquahwa.gov/ActiveProjects/NM21-00002/NM21-00002_1R_Wetland-Report.pdf)

Tree Health Assessment & Arborist Report (August 2020):  
[https://products.issaquahwa.gov/ActiveProjects/NM21-00002/NM21-00002\\_1R\\_Tree-Health-Response.pdf](https://products.issaquahwa.gov/ActiveProjects/NM21-00002/NM21-00002_1R_Tree-Health-Response.pdf)

Updated Arborist Report (April 2021):  
[https://products.issaquahwa.gov/ActiveProjects/SDP20-00001/Tree%20evaluation%20SD%20HS4\\_4\\_21.pdf](https://products.issaquahwa.gov/ActiveProjects/SDP20-00001/Tree%20evaluation%20SD%20HS4_4_21.pdf)

Subsurface Exploration, Geologic Hazard, and Preliminary Geotechnical Engineering Report (March 2021): [https://products.issaquahwa.gov/ActiveProjects/SDP20-00001/SDP20-00001\\_2R\\_Geo-Report\\_2021-03-03.pdf](https://products.issaquahwa.gov/ActiveProjects/SDP20-00001/SDP20-00001_2R_Geo-Report_2021-03-03.pdf)

Draft SEPA Checklist (October 2020):  
<https://products.issaquahwa.gov/ActiveProjects/SDP20-00001/2020-11-02%20PRJ19-00008%20&%20SDP20-00001%20DRAFT%20SEPA%20Checklist.pdf>

**CRITICAL AREA STUDY INFORMATION:**

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**Provide a brief description of the on-site critical areas and/or their buffers and the proposal's relationship to and impacts, if any, on the critical area(s):**

The site contains two Category IV wetlands (shown on Sheet C1.0 LU of the plan set), man-made steep slope areas, and a small portion of a Class 3 Critical Aquifer Recharge Area. The proposal will eliminate Wetland C and provide off-site mitigation. Wetland B will be protected during construction. Grading in the steep slope area will occur during construction. The proposal will not impact the Class 3 Critical Aquifer Recharge Area.

Wetland B: Wetland B is located in the southwestern corner of parcel no. 162406-9029, near the property line shared with Providence Point. Wetland B is a seasonal palustrine wetland and has a multi-stratum vegetation structure comprising a forested vegetation classification, as described in the *Critical Area Study & Wetland Mitigation Plan* prepared by Wetland Resources, Inc. The wetland scored 15 points on the Department of Ecology's Wetland Rating Form for Western Washington, resulting in a Category IV classification. The wetland scored four (4) points for habitat functions, which is a low habitat value score. The wetland is approximately 280 square feet in size. Pursuant to IMC 18.10.640(C), Category IV wetlands less than 2,500 square feet in size do not require a buffer.

Wetland C: Wetland C is located in the southern portion of parcel no. 162406-9001 along an existing paved internal access road. Wetland C is a saturated (non-seasonal) palustrine wetland and is described as a non-persistent emergent wetland in the *Critical Area Study & Wetland Mitigation Plan* prepared by Wetland Resources, Inc. The wetland scored 15 points on the Department of Ecology's Wetland Rating Form for Western Washington, resulting in a Category IV classification. The wetland scored four (4) points for habitat functions, which is a low habitat value score. The wetland is approximately 1,806 square feet in size. Pursuant to IMC 18.10.640(C), Category IV wetlands less than 2,500 square feet in size do not require a buffer.

Steep Slopes: A small area located near the southeast corner of the property has a slope inclination of approximately 40 to 50 percent over a maximum height of approximately 30 feet. The *Subsurface Exploration, Geologic Hazard, and Preliminary Geotechnical Engineering Report* prepared by Associated Earth Sciences, Inc. interprets this slope to be the result of cut slopes made for the construction of 228<sup>th</sup> Avenue SE and the Providence Loop internal access road. Steep slopes have a buffer that is 50 feet from the top, toe, and sides of the slope, which can be reduced to 10 feet when supported by a geotechnical study pursuant to IMC 18.10.580.

Critical Aquifer Recharge Area: A Class 3 Critical Aquifer Recharge Area (CARA) is present to the east of the subject property and partially extending onto the subject property. A Class 3 CARA is defined in IMC 18.10.796 as areas outside wellhead protection areas that are identified as a high aquifer recharge potential area based on characteristics of surficial geology and soil types. Compliance with groundwater quality protection standards established in IMC 13.29, stormwater management requirements in IMC 13.28, and applicable state and local permit requirements are sufficient to protect the Class 3 CARA. The project will not have a probable adverse impact on the Class 3 CARA and a critical areas study for this feature was not required pursuant to IMC 18.10.410(B).

Areas of Concern: During third-party peer review of the *Critical Area Study & Wetland Mitigation Plan* by Herrera, Inc., a potential wetland area in the northwest portion of the site was identified

by standing water and hydrophytic vegetation. Further site investigation by Wetland Resources, Inc. determined that this area of concern is not a wetland.

**1. Was critical area study/ies reviewed by City consultant(s)?**

☒ Yes ☐ No

- Wetland: Reviewed by Herrera, Inc.
- Geotech: Reviewed by Wood Environment & Infrastructure Solutions, Inc.
- CARA: Critical areas report not required per IMC 18.10.410(B).

**2. Does the project propose any adjustments or reductions to alter the Critical Area(s) or associated buffers?**

☒ Yes ☐ No

**If yes, describe and indicate whether the alterations area allowed by code:**

Wetlands B and C: No impacts to Wetland B are proposed or anticipated. The Applicant has established grading and site work limits at least 50 feet away from Wetland B to protect it during construction. After construction, Wetland B will be generally inaccessible except by Issaquah School District's maintenance crew. Site walls and fencing will prevent casual exploration of Wetland B. No direct access to Wetland B is provided. No future work in the vicinity of Wetland B is anticipated.

The Applicant proposes to impact Wetland C in its entirety. According to the *Critical Area Study & Wetland Mitigation Plan*, impacts will be permanent and Wetland C cannot be restored. Pursuant to IMC 18.10.720(B)(3), Category IV wetlands less than 2,500 square feet in size, that are not part of a wetland complex, may be altered if mitigation is provided to demonstrate no net loss of functions or values. This section also establishes criteria for alterations that will be considered during the decision-making process.

The impacts to Wetland C may be allowed by code due to its size, lack of connectivity to a wetland complex, and proposed mitigation, however the Applicant must also demonstrate compliance with IMC 18.10.700. Information on how the impacts are both unavoidable and necessary has not been provided. This analysis must be provided, and third-party peer reviewed, prior to scheduling a public hearing on the proposal or making a decision on the submitted permit applications.

Steep Slope: The Applicant is proposing to alter the steep slope area. Alteration of steep slopes where the slope has been created from previous legal grading activities can be authorized pursuant to IMC 18.10.580(E)(2). As described in the *Subsurface Exploration, Geologic Hazard, and Preliminary Geotechnical Engineering Report*, the steep slope area is the result of cuts made to construct the 228<sup>th</sup> Avenue SE roadway and are considered a previous, legal grading activity. A slope stability analysis performed in the *Subsurface Exploration, Geologic Hazard, and Preliminary Geotechnical Engineering Report* concludes that the proposed alteration will not adversely impact slope stability, the project, or improvements in the vicinity.

**3. Does the proposal protect the Critical Area(s) consistent with Code?**

☒ Yes ☐ No

As described above, Wetland B will be protected during construction by establishing clearing, grading, and site work limits and by site design that makes Wetland B generally inaccessible.

Wetland C will be permanently impacted and mitigated through the purchase of credits at the East Lake Sammamish Mitigation Bank. The proposal is consistent with the Issaquah Municipal Code.

**4. Is Critical Area mitigation proposed or required?**

☒ Yes ☐ No

As described above, Wetland C will be permanently impacted and cannot be restored. Impacts to Wetland C will be mitigated through the purchase of 0.04 credits at the East Lake Sammamish Mitigation Bank. This equates to a 1:1 impact to mitigation ratio. The *Critical Area Study & Wetland Mitigation Plan* indicates this ratio is sufficient to offset the loss of habitat functions and values within the watershed basin.

Mitigation for geologic hazards consists of incorporating structural design standards set forth in the *International Building Code*, as adopted by the City of Issaquah, implementing temporary erosion controls during construction, and installation of permanent drainage control measures. Adherence to the recommended mitigation measures documented in the *Subsurface Exploration, Geologic Hazard, and Preliminary Geotechnical Engineering Report* will be required as a condition of approval of the land use permits.

**5. Does the project offer any improvements to the Critical Area(s)?**

☐ Yes ☒ No

**6. Is the project within Shoreline jurisdiction?**

☐ Yes ☒ No

**TREE PROTECTION & RETENTION INFORMATION:**

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**Provide a brief description of the site's trees and the proposal's relationship to and impacts on trees:**

The project site is approximately 40.79 acres (1,776,913 square feet) in size. The lot was previously developed as Providence Heights College, which has since been demolished. A central clearing is surrounded by mature vegetation. The site contains approximately 43,034 caliper inches of existing significant trees according to the *Tree Retention Re-Evaluation August 2020* portion of the *Tree Health Assessment*.

**1. What are the tree retention requirements for the site and is the project meeting the requirements?**

☐ Yes ☒ No

The site is zoned Community Facilities-Facilities (CF-F) and the proposal is to construct a new consolidated elementary and high school campus. This project is subject to the development standards in IMC 18.07.480. Pursuant to IMC 18.07.480(E)(14), the landscaping standards in the *Central Issaquah Development and Design Standards* (CIDDS) Chapter 10 apply to the project. CIDDS 10.13.A.1 establishes a minimum significant tree retention requirement of 25 percent (25%).

The Applicant has provided conflicting information about the total number of trees to be retained. The *Tree Retention Re-Evaluation August 2020* evaluated an earlier version of the site plan and indicates that approximately 8,634 caliper inches (20%) of trees will be retained. The Applicant submitted a request for modification of tree retention requirements (file no. AAS21-00001) indicating that approximately 23 percent (23%) of significant trees will be retained.

**2. Does proposal request a tree retention reduction? How much? Does it meet the criteria for reduction?**

☒ Yes ☐ No

As described above, the Applicant has requested a modification to reduce the tree retention requirements from 25 percent (25%) to 23 percent (23%). This request is reviewed under file no. AAS21-00001 and must demonstrate compliance with the criteria in CIDDs 10.13.B.

**3. Does the project propose to replace trees?**

☒ Yes ☐ No

**If yes, please explain if trees will be on-site, off-site, and/or paying into the Tree Fund.**

The Applicant is proposing to replace trees by planting 883 trees on site, approximately 49 percent (49%) will be native trees.

**4. Does the project meet tree density?**

☒ Yes ☐ No

**If yes, describe how.**

Pursuant to CIDDs 10.10.A, a minimum tree density of four (4) significant trees per 5,000 square feet of developable site area are required. Tree density can be achieved by retained trees and replanted/replaced trees. The site has a total developable site area of approximately 1,776,633 square feet and must have approximately 1,422 trees on site to meet minimum tree density requirements. The Applicant will retain approximately 662 trees on the site and will plant 883 trees on the site, resulting in a total of 1,545 trees which meets applicable tree density requirements.